

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both)	
individually and as Legal Guardian of)	
SHANE ALLEN LOVELAND, et al.,)	
)	
Plaintiffs,)	
)	Case No. 8:18-cv-00127
v.)	
)	
THE GOODYEAR TIRE & RUBBER)	
COMPANY,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR ENTRY OF A
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

COMES NOW The Goodyear Tire & Rubber Company (“Goodyear”), by and through its attorneys, and moves this Court to enter a Confidentiality Agreement and Protective Order concerning the disclosure of certain confidential information. In support of this motion, Goodyear states:

This matter will involve the production of confidential trade secret, financial, process, marketing, health, and business information, or other commercial information within the meaning of Federal Rule of Civil Procedure 26.

FED. R. Civ. P. 26 provides that disclosure or discovery may be had on specific terms and conditions, and states that a court may enter an order to protect the dissemination of “trade secret or other confidential research, development, or commercial information.”

The parties have agreed to the terms and conditions governing the discovery and disclosure of the confidential documents. The proposed Confidentiality Agreement and Protective Order is attached as **Exhibit A**.

WHEREFORE, The Goodyear Tire & Rubber Company respectfully moves this Court to enter the proposed stipulated Confidentiality Agreement and Protective Order limiting the disclosure of certain confidential documents and information as set forth above, and for any other relief this Court deems proper.

GREENSFELDER, HEMKER & GALE, P.C.

By: s/ Edward S. Bott, Jr.

Edward S. Bott, Jr.

Clark W. Hedger

Juliane M. Rodriguez

10 South Broadway, Suite 2000

St. Louis, MO 63102

(314) 241-9090

Fax: (314) 345-5465

esb@greensfelder.com

chl@greensfelder.com

jrodriguez@greensfelder.com

AND

BAIRD HOLM LLP

Jennifer D. Tricker (NE# 23022)

1700 Farnam Street, Suite 1500

Omaha, NE 68102-2068

(402) 344-0500

jtricker@bairdholm.com

*Attorneys for The Goodyear Tire & Rubber
Company*

CERTIFICATE OF SERVICE

I hereby certify that I have on this 18th day of June, 2018, electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Edward S. Bott, Jr.